

United States District Court

for the
Western District of New York

United States of America

v.

JARED MARC BROWN

Case No. 15-M-124

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on or about September 6, 2015, and continuing until on or about September 11, 2015, in the Western District of New York, the above named defendant did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States; in violation of Title 18, United States Code, Section 871.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



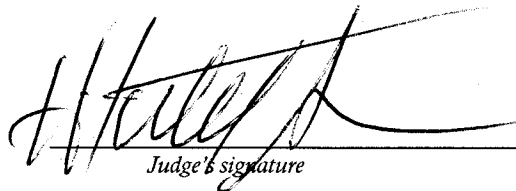
Complainant's signature

Roberta Kane, Special Agent
United States Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date: October 1, 2015



Judge's signature

City and State: Buffalo, New York

H.KENNETH SCHROEDER, JR.
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFLAO)

ROBERTA KANE, being duly sworn, states:

1. I am a Special Agent of the United States Secret Service. I am assigned to the Buffalo Field Office, where my duties include the investigation of threats against protected individuals and places, including but not limited to the President of The United States, former Presidents and facilities under the direct protection of the United States Secret Service.

2. As part of my duties, I am assisting in an investigation of suspected violation of Title 18, United States Code, Section 871, by **Jared Marc BROWN**.

3. This affidavit is submitted in support of a criminal complaint charging that **BROWN** knowingly and willingly threatened to kill or inflict bodily harm upon the President of the United States in violation of 18 U.S.C § 871.

4. The information contained in this affidavit is based upon information I have gathered from my investigation, my personal observations, my training and experience and/or information relayed to me by other law enforcement officers and or/agents. Since

this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to believe that Title 18, United States Code, Section, 871 has been violated.

PROBABLE CAUSE

5. Barack Obama is the forty-fourth and current President of the United States.

6. On or about September 6, 2015, **Jared Marc BROWN** telephonically contacted the Lockport City Police Department, Lockport, NY, through the 911 Emergency Call Center. During the call, the individual later determined to be **Jared Marc BROWN** stated to an employee of the City of Lockport Police Department that he would kill President Obama.

7. On September 11, 2015, Special Agent Vincent Merlino of the United States Secret Service contacted **Jared Marc BROWN** at the Niagara County Jail. **BROWN** was Mirandized and was questioned regarding the statement he made that he would "kill the President." When asked if he made the statement to 911 call center and others, he stated, matter of factly, that yes, he did. **Jared Marc BROWN** further said, "Yeah I would kill him." When asked, hypothetically, what he would do if the President walked through the interview room, **BROWN** stated "I would shoot that n-----". **Jared Marc BROWN** expressed no remorse or justification for making the threats.

8. BROWN also told Special Agent Merlino, among other things: a) he had thoughts of killing the President of the United States; b) he watched shows on serial killers and assassins; c) he has used a computer to look up how to make a bomb and kill people; d) he had called the FBI, Lockport PD, and the State Police on September 6, 2015, to say he wanted to kill the President of the United States; and e) he had bought a gun on the street, fired it at people on two separate occasions, and has disposed of the gun.

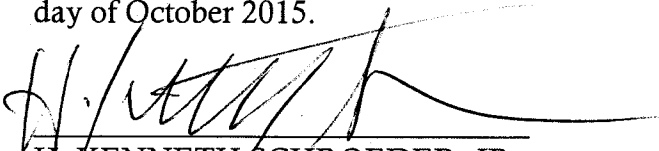
WHEREFORE, your affiant respectfully submits there is probable cause to believe that **Jared Marc BROWN** made a threat to kill the President of the United States, in violation of Title 18, United States Code, § 871.



ROBERTA KANE
Special Agent
United States Secret Service

Sworn to before me this 1st

day of October 2015.



H. KENNETH SCHROEDER, JR.
United States Magistrate Judge